

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: FLINT WATER CASES.

Case No. 5:16-cv-10444-JEL-MKM

Hon. Judith E. Levy, District Judge
Hon. Elizabeth A. Stafford, Magistrate
Judge

**DECLARATION OF KELLY B. KRAMER IN SUPPORT DEFENDANTS
VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH AMERICA, INC.,
AND VEOLIA WATER NORTH AMERICA OPERATING SERVICES,
LLC’S RESPONSE TO PLAINTIFFS’ MOTION TO COMPEL**

I, Kelly B. Kramer, declare as follows:

1. I am a Partner at Mayer Brown LLP, and I represent Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively, VNA) in the above-captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit 1 is a table listing the latest production date of each document subject to Plaintiffs’ challenges.

3. Attached as Exhibit 2 is a table listing VNA’s good-cause assertions for privileged documents.

4. Attached as Exhibit 3 is a table listing VNA’s good-cause assertions for documents related to its work on behalf of the Detroit Water & Sewage Department (DWSD).

5. Attached as Exhibit 4 is a table listing VNA's good-cause assertions for internal business documents.

6. Attached as Exhibit 5 is a table listing VNA's good-cause assertions for public-relations documents.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on February 14, 2024
Washington, D.C.

/s/ Kelly B. Kramer
Kelly B. Kramer